

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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Caption in Compliance with D.N.J. LBR 9004-1(b)

Gillman, Bruton & Capone, LLC
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Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Steven Tursi
Cristina Tursi

Case No.: 18-34145

Judge: CMG

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for February 17, 2021, at 9.

☐ Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☒ Payments have been made in the amount of \$ 1568.00, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Debtors were not aware of delinquency. Debtors had issue with a returned payment in December, 2020, but immediately made a replacement payment and have made regular monthly Trustee payment for January and February 2021. In reviewing payment history, there may be a delinquency of \$49.00 from the month the payment increased which Debtors can cure.

☒ Other (**explain your answer**):

As to the stay relief granted to Santander in 4/4/2019, this related to an auto lease. The Debtors turned in the vehicle at the end of the lease term.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 2/9/2021

/s/ Steven Tursi
Debtor's Signature

Date: 2/9/2021

/s/Cristina Tursi
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.